

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition	
Of	Docket No. JKB 24-cv-941
GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,	<u>IN ADMIRALTY</u>
And	
SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,	
for Exoneration from or Limitation of Liability	

THE STATE OF MARYLAND’S MOTION FOR A LETTER OF REQUEST

NOW INTO COURT, through undersigned counsel, comes the State of Maryland, by and through Anthony G. Brown, Attorney General of Maryland, on its own behalf and on behalf of all its agencies (the “State”); the Maryland Transportation Authority (“MDTA”), the Maryland Port Administration (“MPA”), and the Maryland Department of the Environment (“MDE”) (collectively, “Claimants”), who respectfully request this Court issue the attached Letter of Request¹ to allow the State to obtain relevant discovery from HD Hyundai Heavy Industries Co., Ltd. (“HHI”).

¹ The State notes that the attached Letter of Request is in English which is acceptable to the Republic of Korea. *See* Republic of Korea - Central Authority & Practical Information, HCCH, <https://www.hcch.net/en/states/authorities/details3/?aid=846#:~:text=The%20Republic%20of%20Korea%20will,Request%20with%20a%20Korean%20translation>. (last visited Jan 15, 2025).

HHI is a Korean company based at 1000, Bangeojinsunhwan-doro, Dong-gu, Ulsan, 44032, South Korea. It specializes in shipbuilding, engineering, and maritime machinery. HHI designed and built the M/V DALI at its shipyard in the Republic of Korea. As recently as 2024, HHI and its authorized service representatives have provided support to the DALI, its managers, and its owners.

HHI has cooperated with a prior Letter of Request for Documents previously issued by this Court. Even so, there is significant information and context that can only be obtained by deposition. Additionally, a deposition can authenticate documents produced by HHI in response to the prior Letter of Request.

The Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, as adopted and implemented at 28 U.S.C. § 1781, authorizes this Court to request assistance from Korean judicial authorities in obtaining evidence from HHI.

Therefore, the State respectfully requests that the Court sign and issue the Letter of Request attached as Exhibit A in order to facilitate a Deposition by Written Question of HD Hyundai Heavy Industries Co., Ltd.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I CERTIFY that on this 31st day of July 2025, the foregoing was filed in the United States District Court for the District of Maryland via the Court's CM/ECF filing system, which will provide notice of this filing to all counsel of record.

/s/ David Reisman
David L. Reisman